



PARTNERS
Phillip C. Hamilton, Esq.
Lance A. Clarke, Esq.
Jason M. Clark, Esq.
William F. Guilford, Esq.

January 7, 2022

The Honorable Judge D.P. Marshall, Jr.
600 West Capitol Avenue, Room B149
Little Rock, AR 72201

Via ECF

Re: United States v. Brittany Dawn Jeffrey, 4:20-cr-288 (DPM) (JJV)

Dear Judge Marshall:

We write on behalf of Brittany Dawn Jeffrey, to request her temporary release from the Greene County Detention Center in Paragould, AR, so that she may attend her grandmother's funeral on Saturday, January 15, 2022. Ms. Jeffrey's grandmother, Annie Ruth Jeffrey, with whom Ms. Jeffrey was exceptionally close, passed away on January 3, 2022. Ms. Jeffrey requests the opportunity to be allowed to grieve with her family, and to be present when her grandmother is put to rest.

Both the Government and U.S. Pretrial Services defer to the Court's decision with respect to this request.

Ms. Annie Ruth Jeffrey was the mother of Ms. Jeffrey's father, Mr. Lee A. Jeffrey, Jr. During the early part of Brittany's life, Mr. Jeffrey was enlisted in the United States Navy aboard the USS Chicago and USS Norfolk as a Sonar Technician. Due to his multiple deployments, he missed much of Ms. Jeffrey's childhood. During those periods, Ms. Jeffrey's grandmother would come live with them to assist in caring for and raising Ms. Jeffrey. Ms. Jeffrey's grandmother was more than a great help, she was a second mother.

The Bail Reform Act provides that a "judicial officer may... permit the temporary release of [a] person ... to the extent that the judicial officer determines such release to be necessary for preparation of the person's defense *or for another compelling reason.*" 18 U.S.C. § 3142(i) (emphasis added). Federal courts within and outside of the 8th Circuit have granted temporary release for detained individuals to attend family members' funerals. See, e.g., *United States v. Standish*, 17 Cr. 133 (CRH) (D.N.D.) (releasing defendant to third-party custody of her sister for thirty hours to attend her mother's funeral); *United States v. Dunn*, 11 Cr. 638 (SAS) (S.D.N.Y.) (releasing defendant on a \$30,000 personal recognizance bond to allow him to attend brother's memorial service); *United States v. Summers*, 09 Cr. 807 (DLC) (S.D.N.Y.) (releasing defendant to attend partner's funeral); *United States v. Firpo*, 11 Cr. 247 (RWS) (S.D.N.Y.) (releasing defendant to attend mother's funeral in the custody of the U.S. Marshal Service).

From the inception of our representation on this matter, the importance of following the Court's conditions has been strongly reiterated to Ms. Jeffrey and her family. At this point, they all have a renewed understanding, appreciation, and respect for why the conditions ordered by the Court must be obeyed. If the Court is amenable, Mr. Jeffrey proposes to be the third-party custodian for the purposes of Ms. Jeffrey being able to attend his mother's funeral (*See* attached letter from Mr. Jeffrey). He would personally sign a bond promising to uphold any and all conditions (e.g., enforcing a curfew, ensuring that Ms. Jeffrey adheres to the Court's conditions regarding drug use, taking Ms. Jeffrey to U.S. Pretrial Services to be outfitted with electronic monitoring, etc.) that the Court may set with respect to this request. As a former member of the U.S. Navy, he promises to uphold his oath to the Court the same as he honorably upholds his oath to our country.

The visitation for Ms. Jeffrey's grandmother is currently scheduled for Friday, January 14, from 9am to 6pm at Ruffin and Jarret Funeral Home located at 1200 S. Chester Street, Little Rock, AR. The funeral service is scheduled for the next day at 10am, at NLR First Assembly of God, located at 4501 Burrow Dr., North Little Rock, AR. The interment will immediately follow the funeral at Griffin Leggett Rest Hills, 7724 Landers Road, North Little Rock, AR. (*See* the attached Announcement).

Ms. Jeffrey respectfully proposes that the Court release her on Friday, January 14, at 2pm, into the custody of her father, and allow her to return to the Greene County Detention Center (a 2.5-hour drive from Little Rock) on Saturday, January 15, at 8pm after the services. If released, Ms. Jeffrey will spend Friday night with her father at her Aunt Carol's home (Mr. Jeffrey's sister, who resides with her husband, Darryl Pickens), located at 8313 Edmar Place, North Little Rock, AR 72117.

Due to the time-sensitive nature of this request, we humbly request the Court's compassion and discretion to allow Ms. Jeffrey to say her final goodbyes to her grandmother in person and with her loved ones. We respectfully thank the Court in advance for whatever mercy may be afforded.

Regards,

Phillip C. Hamilton
Phillip C. Hamilton, Esq.

Lance A. Clarke
Lance A. Clarke, Esq.

Attorneys for Brittany D. Jeffrey
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LC@HamiltonClarkeLLP.com

cc: AUSA Stacy Williams, Esq. (by ECF)
AUSA John White, Esq. (by ECF)

Homegoing Celebration FOR



Sunrise
October 11, 1936

Sunset
January 3, 2022



Annie Ruth Jeffrey

Saturday, January 15, 2022
10:00 A.M.

North Little Rock First Assembly of God
4501 Burrow Dr.
N. Little Rock, AR



Annie Ruth Jeffrey, daughter of the late Harvey and Mattie Lee Lewis was born October 11, 1936 in Chattanooga, Tennessee. She was a proud graduate of Chattanooga's Howard High School and went on to complete her undergraduate studies at Tuskegee University in Tuskegee, Alabama. After graduating from Tuskegee, she studied nursing at Grady Memorial School of Nursing in Atlanta, Georgia which led to a nursing career that spanned nearly forty years.

But more than her educational and professional successes, Annie Jeffrey was a faithful and humble servant of her Lord and Savior, Jesus Christ. She was not shy about her faith and desired for those she knew and met to make the choice to accept Jesus Christ into their lives as well. She served Him faithfully until she departed this life on January 3, 2022. Her soul is now at rest.

Annie was preceded in death by her parents, son Ben Jeffrey, sisters Dwartha Grayson and Thelma Smith, and brothers Raymond Lewis, Harvey Lewis and Nathaniel Lewis.

She is survived by and leaves to cherish her beautiful life three children - Lee Jeffrey, Jr., Carol (Darryl) Pickens, and Candace (Kevin) McKeever; six grandchildren - LaKeisha Pickens, Brittany Jeffrey, Ashley Jeffrey, Anthony Pickens, Kevin Warren McKeever and Ebony McKeever; three great-grandchildren - Brione Kelly, Azariah Thomas and Kendyl Pickens; two sisters - Lillie Broadnax and Barbara Ann Ross; a host of nieces and nephews; and close friends MaJoyce Thomas, Martha and James & Ozetta Johnson.





Order of Service

Processional of Family

Old Testament Reading of Psalm 23 by

New Testament Reading of by Christine Jeffrey

Solo – What a Friend We Have in Jesus by Patsy Artis

Reading of the Obituary – NLR First Assembly of God pastor

Special Remarks – Lee A. Jeffrey, Jr.

Eulogy – Rev. James Johnson

Benediction – Rev. Gordin V. Hardin

Recessional



Pall Bearers

Rev. Ronnie Williams

Rev. John Carter

Deacon Phillip Bonner

Michael Fountain

Darin Bradley

Earl Rainey

Honorary Pall Bearers

LaKeisha Pickens

Brittany Jeffrey

Ashley Jeffrey

Anthony Pickens

Kevin W. McKeever

Ebony McKeever

Interment immediately following service

Griffin Leggett Rest Hills

7724 Landers Rd.

North Little Rock, AR

**Services directed by
Ruffin & Jarrett Funeral Home**



Phillip C. Hamilton, Esq. <ph@hamiltonclarkellp.com>

FW: Letter

1 message

Lance A. Clarke, Esq. <lc@hamiltonclarkellp.com>
To: Phillip Hamilton <ph@hamiltonclarkellp.com>

Fri, Jan 7, 2022 at 2:41 PM

Letter sent back from father



Lance A. Clarke, Esq.

Partner

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New York, New York 10005

T: 212-729-0952 F: 646-779-0719

LC@HamiltonClarkeLLP.com

HamiltonClarkeLLP.com

From: Lee Jeffrey Jr <proflaj02@yahoo.com>
Sent: Friday, January 7, 2022 2:34 PM
To: lc@hamiltonclarkellp.com
Subject: Re: Letter

See below please. Thank you!

Respectfully,

Lee A; Jeffrey, Jr.

[Sent from Yahoo Mail on Android](#)

On Fri, Jan 7, 2022 at 12:51, Lance A. Clarke, Esq.

<lc@hamiltonclarkellp.com> wrote:

Your Honor,

As a young father enlisted in the United States Navy aboard the USS Chicago and USS Norfolk, by nature of my duty to country, I missed many portions of Brittany's childhood while deployed away to various places as Belgium, Canada, Hawaii, Guam, Philippines, and Japan. Because our mission was to remain undetected, communication with our families were scarce, and our submarine would only surface periodically to receive limited messages from our loved ones. During those period,s my mother would come live with my ex-wife to assist in caring for and raising Brittany.

Without question, my mother was a great help. She stepped in for me when I was on tour to help raise Brittany. She has always been, and will always be, a second mother to Brittany. I humbly ask that you allow Brittany the opportunity to attend my mother's funeral. I will ensure that ANY and EVERY condition set by this Court will be respected and adhered to.

Thank you very much for your consideration

Lee A; Jeffrey, Jr.

STS2 (SS), Submarines, U.S. Navy



Lance A. Clarke, Esq.

Partner

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